

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 4:20 CR 00401 AGF DDN
)	
JERRY JACKSON,)	
)	
Defendant.)	

MOTION FOR PRETRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its Attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Donald S. Boyce, Assistant United States Attorney for said District, and moves the Court to order Defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, §3141, et seq.

As and for its grounds, the United States of America states as follows:

1. Defendant is charged with (Count 1) Carjacking, in violation of 18 U.S.C. §2119 and (Count 2) Possession of a Firearm in Furtherance of a Crime of Violence, in violation of 18 U.S.C. §924(c). Pursuant to Title 18, United States Code, Section 4142(f)(1)(A), this case involves a charge of Carjacking, which is a crime of violence. Pursuant to Title 18, United States Code, Section 3142(e)(3)(B), the rebuttable presumption of detention applies because the Defendant has been charged with a violation of 18 U.S.C. §924(c).

2. According to St. Louis Metropolitan Police Department Report #20-023143, on June 1, 2019, a woman was in front of her house in the City of St. Louis getting into her Ford Explorer to leave for work. A black Audi pulled up next to her with three men inside. The two passengers

got out of the Audi, pointed guns at the woman, and took her car. The third man followed in the black Audi. Police located video of the Audi on cameras near the scene of the carjacking and were able to identify the vehicle. On June 5, Richmond Heights Police encountered the black Audi driving as part of a caravan of cars near the Galleria Mall. When police got behind the caravan, the cars split up and the black Audi fled from police. Richmond Heights Police, joined by officers from other departments, chased the Audi into the City of St. Louis, where it crashed near Forest Park Community College. The occupants of the Audi ran from the scene of the crash and were eventually arrested by officers of the Clayton PD. The driver of the Audi was Lamont Carter and Montez Wicks and Jerray Jackson were the passengers. Two guns were recovered from inside the Audi, and Wicks was wearing a ski mask (with the face covering rolled up on his head). Police showed separate photo arrays of Carter, Wicks, and Jackson to the carjacking victim, and she positively identified all three defendants as the men who had carjacked her.

4. A review of the Defendant's criminal history indicates that on October 22, 2019, the Defendant was convicted of Aggravated Domestic Battery and sentenced to 30 months' probation. It appears the Defendant was on probation for that offense at the time of the instant offense.

5. Based on the statutory factors in 18 U.S.C. § 3142(g), detention is appropriate in this case. Pursuant to Section 3142(g)(1), the nature and circumstances of this case are that the Defendant has been charged with a crime of violence and a firearm offense. The offense also involved the Defendant's attempt to flee from officers. Pursuant to Section 3142(g)(2), the weight of the evidence against the Defendant, as summarized above, is strong. Pursuant to Section 3142(g)(3)(A), the Defendant's criminal history includes a prior felony conviction for Aggravated Domestic Battery, which is a violent crime. Pursuant to Section 3142(g)(3)(B), it appears that the Defendant was on probation for Aggravated Domestic Battery at the time of the instant offense.

WHEREFORE, the United States requests this Court to order Defendant detained prior to

trial, and further to order a detention hearing three (3) days from the date of Defendant's initial appearance.

Respectfully submitted,

JEFFREY B. JENSEN
United States Attorney

/s/ Donald S. Boyce
DONALD S. BOYCE, #6282562IL
Assistant United States Attorney